



Air Quality Permitting Response to Public Comments

September 28, 2016

Permit to Construct No. P-2016.0012

**Trails West Manufacturing of Idaho – Industrial Park
Preston, Idaho**

Facility ID No. 041-00022

Prepared by:
Tom Burnham, Permit Writer
AIR QUALITY DIVISION

FINAL

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct the Trails West Manufacturing of Idaho – Industrial Park from August 24, 2016 through September 23, 2016, in accordance with IDAPA 58.01.01.209.01(c). During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

- Comment 1: The proposed PTC includes daily monitoring requirements for emissions of toxic air pollutants (TAPs) through recording the daily usage of all VOC, solids, and TAP containing materials that emit air pollution. Per permit condition 2.3 and 2.12, Trails West is to utilize the material usage tracking as a means to ensure that TAPs emissions do not exceed emission screening levels (EL) or acceptable ambient concentrations (AACs) listed for TAPs in Idaho's Air Quality Rules (IDAPA 58.01.01.585 and 58.01.01.586). These permit conditions on TAPs emissions could serve as a means to limit emissions, however DEQ includes provisions allowing Trails West to exceed TAP ELs and AACs provided they perform modeling after the emissions occur to determine the impact to ambient air quality. This proposed management strategy is concerning as it has potential to create ambiguity in operations and non-compliance with Idaho's Air Quality Rules.

Some air quality permits require modeling to demonstrate pre-construction compliance with air quality standards. This modeling is performed prior to approval of the permit in order to ensure satisfaction from DEQ and protection of the public. However in this proposed PTC it is included as a stipulation if emissions exceed ELs in Idaho's Air Quality Rules. If there is even a slight potential that ELs will be exceeded then modeling must be performed prior to this permit being approved. Trails West is required to show that if they emit pollutants at levels greater than the ELs than this will not degrade ambient air quality and negatively impact the nearby population.

As the permit currently reads, modeling is only required after an emission event above the EL occurs. This is inappropriate for multiple reasons, including:

1. TAPs emissions are solely based on material usage, meaning they are entirely in control of Trails West. Without modeling results showing that ambient air quality will not be degraded when emissions exceed ELs, Trails West is responsible for curbing their emissions by halting operations when they approach EL thresholds.
2. Trails West is required to report modeling results to DEQ on an annual basis. This creates up to a year of potentially hazardous emissions emanating from the facility and impacting nearby residents.

Based on this information, we believe it is inappropriate to include permit provisions that do not assuredly protect the public and comply with Idaho's Air Quality rules. We suggest DEQ utilize the ELs as an emission cap for this permit and remove any language that allows Trails West to emit at levels greater than the ELs without prior support of an ambient air impacts analysis.

Response 1: DEQ understands the concern; however, the permit does not allow any Idaho Air Pollution Rules to be violated. The permit limits daily TAP emissions to less than or equal to the screening emissions level (EL) times 24, or below the acceptable ambient concentrations listed in Section 585 & 586 of the Rules. The EL multiplied by the total hours in a day serves as a daily monitoring standard that is applied to ensure compliance with the EL hourly screening level. If emissions exceed the EL times 24 then the facility shall model emission rates to determine ambient impacts. This is consistent with the toxic air pollutant exemption criteria at Section 223.02.b of the Rules which allows the facility to conduct the analysis and maintain documentation on-site without a need to obtain prior DEQ approval of the analysis; an annual report is required by the exemption criteria at Section 223.05 and the permit also requires an annual report when modeling is conducted. This method of allowing this flexibility within a permit is preferable to a facility self-exempting themselves, with no knowledge of requirements for modeling to demonstrate compliance.

As stated in the Statement of Basis, the permit requires keeping records of emissions daily and annually, reporting whenever a modeling exercise is conducted to show that impacts are below acceptable ambient concentrations.

It should also be noted that the permittee certifies that the information provided is true, accurate and complete in accordance with IDAPA 58.01.01.123. Finally, if DEQ inspects a source and determines it does not meet the threshold criteria, then the owner or operator is subject to enforcement pursuant to Idaho Code Section 39-108.

Appendix

Public Comments Submitted for

Permit to Construct No. P-2012.0012



208.345.6933 • PO Box 844 Boise, ID 83702 • www.idahocconservation.org • idahocconservation.org

9/22/2016

Anne Drier
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Tom Burnham
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Submitted via email: anne.drier@deq.idaho.gov and tom.burnham@deq.idaho.gov

RE: PTC number P-2016.0012 for Trails West Manufacturing of Idaho

Dear Ms. Drier and Mr. Burnham;

Thank you for the opportunity to comment on the draft air quality permit to construct (PTC) for the Trails West Manufacturing (Trails West) facility in Preston, ID. Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

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Trails West to exceed TAP ELs and AACs provided they perform modeling after the emissions occur to determine the impact to ambient air quality. This proposed management strategy is concerning as it has potential to create ambiguity in operations and non-compliance with Idaho's Air Quality Rules.

¹ IDAPA 58.01.01.585 and 58.01.01.586

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proposed PTC it is included as a stipulation if emissions exceed ELs in Idaho's Air Quality Rules. If there is even a slight potential that ELs will be exceeded then modeling must be performed prior to this permit being approved. Trails West is required to show that if they emit pollutants at levels greater than the ELs then this will not degrade ambient air quality and negatively impact the nearby population.

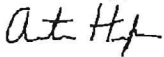
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Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,



Austin Hopkins Conservation Assistant